

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

-against-

LETTER
IND# 22-CR-692 (LGS)

LAMOR WHITEHEAD,

Defendant.
-----X

Your Honor,

Through this letter counsel Dawn M. Florio, Esq. writes to the Court regarding the Government's response.

The defense has identified that we may wish to use the following exhibits from the Government's exhibit list. The Government states that our prior letter "does not provide sufficient information to permit the Government to lodge objections[.]" The defense is unaware of what objections the Government would lodge to their own exhibits.

The defense identifies the following exhibits as ones which we may seek to introduce for non-impeachment purposes from the Government's Exhibit List:

351-01	Device 1B2 - Preliminary Device Report	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-02	Device 1B2 - User Accounts	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-03	Device 1B2 - Selected Instant Messages and Contacts	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-04	Device 1B2 - Chat 9 - Full Chat Between Defendant and Victim-1's Son	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-05	Device 1B2 - Chat 15 - Full Chat Between Defendant and Victim-1's Son	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-06	Device 1B2 - Chat 16 - Full Chat Between Defendant and Victim-1's Son	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-07	Device 1B2 - Chat 22 - Full Chat Between Defendant and Victim-1's Son	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13

351-08	Device 1B2 - Chat 3 - Full Chat Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-09	Device 1B2 - Chat 3 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-10	Device 1B2 - Chat 3 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-11	Device 1B2 - Chat 3 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-12	Device 1B2 - Chat 3 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-13	Device 1B2 - Chat 3 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-14	Device 1B2 - Chat 4 - Full Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-15	Device 1B2 - Chat 8 - Full Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-16	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-17	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-18	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-19	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-20	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-21	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-22	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-23	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-24	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-25	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13

351-26	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-27	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-28	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-29	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-30	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-31	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-32	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-33	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-34	Device 1B2 - Chat 8 - Selected Excerpts of Chats Between Defendant and Victim-2	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-35	Device 1B2 - Chat 28 - Full Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-36	Device 1B2 - Chat 34 - Full Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-37	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-38	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-39	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-40	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-41	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-42	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-43	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13

351-44	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-45	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-46	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-47	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-48	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-49	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-50	Device 1B2 - Chat 34 - Selected Excerpts of Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-51	Device 1B2 - Chat 34 - Selected Excerpts and Attachments - Chats Between Defendant and EA	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-52	Device 1B2 - Extraction Report Reflecting 1 Email From whiteheadlamor@gmail.com to alliedproperties6@gmail.com	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-53	May 10, 2022 Email From whiteheadlamor@gmail.com to Allied Real Estate Development	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-54	Device 1B2 - Extraction Report Reflecting 1 Email From stone@sunsetequitygroup.com to whiteheadlamor@gmail.com and carlos@sunsetequitygroup.com	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13
351-55	May 12, 2022 Email From stone@sunsetequitygroup.com to whiteheadlamor@gmail.com and Carlos Yanez	2023.01.06; 2023.09.08; 2023.11.02; 2024.01.26; 2024.02.13

DATED: New York, New York
February 17, 2024

Yours, etc.,
Dawn M. Florio

Dawn M. Florio Law Firm P.L.L.C.
By DAWN M. FLORIO
Attorney for Defendant

LAMOR WHITEHEAD
488 Madison Ave, 20th Floor
New York, NY 10022
(212) 939-9539

To: Clerk of the District Court
Southern District of New York

Assistant United States Attorney Jane Kim
Assistant United States Attorney Jessica Greenwood
Assistant United States Attorney Derek Wikstrom